

**From:** [Basu, Bilin](#)  
**To:** [Hickey, Patrick J. \(he/him/his\)](#)  
**Subject:** RE: JBLM - PFAS\_NPDES/CERCLA Integration  
**Date:** Monday, January 23, 2023 2:57:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Hi Patrick,

I just sent you a Teams meeting invite for Wednesday afternoon. I think a meeting would be easier to go through your questions, while giving context of what is involved in a stormwater permit.

Here's the link to the existing [JBLM stormwater permit](#). The existing permit was issued in 2013 (it expired in 2018 and is now administratively continued) and it doesn't contain any conditions directly related to PFAS.

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**From:** Hickey, Patrick J. (he/him/his) <[hickey.patrick@epa.gov](mailto:hickey.patrick@epa.gov)>  
**Sent:** Monday, January 23, 2023 10:20 AM  
**To:** Basu, Bilin <[Basu.Bilin@epa.gov](mailto:Basu.Bilin@epa.gov)>  
**Subject:** RE: JBLM - PFAS\_NPDES/CERCLA Integration

Good morning Bilin!

(b) (6)

[Redacted content]

I appreciate the information, and I do have a couple of questions...

1. Where might I access the current JBLM storm water permit? I haven't reviewed any in a long time, so getting familiar with JBLM's would serve to knock out time items at once.
2. Is there anything in a storm water permit associated with the storage of PFAS contaminated soils (e.g., uncovered repository)? I know that JBLM has a sizeable amount of soil removed from a spill site located at a place they refer to as the Lincoln Pit. There was to be some bridge repair work as well along Clover Creek to the south of the McChord flightline (which has historically seen AFFF/PFAS contamination), and the soils generated from those repairs will also be stored at the Lincoln Pit. I had concerns when I learned that the repository didn't have an infiltration reduction/prevention liner or cover.
3. Does the permit require specific PFAS treatment technologies for wastewater/stormwater?
4. And I'm curious why 18 months is being allowed for the grab samples when the facility has a known PFAS contamination history and is impacting neighboring water districts. Is this a

standard time frame granted?

Thanks so much! If it is easier, we can schedule a quick Teams meeting to discuss my questions... but I'd probably need to take a looksee at the existing permit so I have a better grasp of what's at play here. Let me know what you think!

Much appreciated and welcome back to the overcast PNW!

Very Respectfully,



Patrick Hickey  
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*As sworn-to-duty public servants, we have a responsibility to the United States Government and its citizens to place loyalty to the Constitution, laws and ethics principles above our own private gain.*

**From:** Basu, Bilin <[Basu.Bilin@epa.gov](mailto:Basu.Bilin@epa.gov)>  
**Sent:** Friday, January 20, 2023 4:41 PM  
**To:** Hickey, Patrick J. (he/him/his) <[hickey.patrick@epa.gov](mailto:hickey.patrick@epa.gov)>  
**Subject:** RE: JBLM - PFAS\_NPDES/CERCLA Integration

Hey Patrick,

(b) (6)

Here are the permit conditions that I added for PFAS in the JBLM Stormwater Permit. The major additions are for the permittee to develop a PFAS management plan, identify stormwater outfalls with potential PFAS infiltration across the base (this is based on a preliminary PFAS site assessment that JBLM completed), and implement wet weather PFAS monitoring using EPA Method 1633.

Revised Permit Conditions to Address PFAS	Permit
The EPA is authorizing discharges from emergency firefighting	Part 1.3.4.2

activities, including activities that involve PFAS-containing AFFFs.	
The EPA requires that the Permittee engage those potentially affected by stormwater discharges in establishing stormwater management priorities.	Part 2.2.2
The EPA emphasizes that areas of known contamination should be included in maps of the MS4.	Part 2.3.1
The EPA limits the authorization of discharges from emergency firefighting activities only to those that do not involve PFAS-containing AFFFs and those that are in compliance with Part 2.5.8.	Part 2.3.2.1
The EPA emphasizes the importance of including known areas of contamination in priorities for the IDDE program.	Part 2.3.3.1
The EPA consolidated the notification requirement for spills and illicit discharges and emphasized procedures for doing so. The EPA specifically articulates the scope of who must be notified. The Agency emphasizes the importance of including potential effects in those notifications, as appropriate.	Part 2.3.3.4
The EPA is requiring JBLM to identify potential PFAS infiltration to receiving waters via the MS4 infrastructure.	Part 2.3.4
The EPA added runways and airfields, including clean-ups from firefighting activities to the list of areas/activities for which maintenance practices must be established.	Part 2.5.6
The EPA requires the Permittee to develop and implement appropriate stormwater management controls to minimize discharges of PFAS via the MS4 during emergency firefighting activities.	Part 2.5.8
The EPA added PFAS-containing AFFF usage and clean-up to the elements required to be included in stormwater pollution prevention plans for equipment maintenance/material storage yards, if relevant.	Part 2.5.9
The EPA added Per- and polyfluoroalkyl substances (PFAS)	Table 3.3.5
Beginning within 18 months of the permit issuance, the Permittee must begin quarterly grab sample wet weather water quality monitoring for PFAS.	Part 3.5

Let me know if you have any questions or want to discuss more.

Bilin

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**From:** Hickey, Patrick J. (He/Him/His) <[hickey.patrick@epa.gov](mailto:hickey.patrick@epa.gov)>  
**Sent:** Monday, January 9, 2023 7:24 AM  
**To:** Basu, Bilin <[Basu.Bilin@epa.gov](mailto:Basu.Bilin@epa.gov)>  
**Subject:** RE: JBLM - PFAS\_NPDES/CERCLA Integration

Bilin,

I would very much like to see what you are proposing for the JBLM NPDES stormwater permit. Sorry it has taken a bit to get back to you, but between end of year action items and a FIOA I've been stretched.

My calendar should be up to date. Hope your tropical vacation was delightful and relaxing!

Very Respectfully,



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**From:** Basu, Bilin <[Basu.Bilin@epa.gov](mailto:Basu.Bilin@epa.gov)>  
**Sent:** Wednesday, December 14, 2022 1:57 PM  
**To:** Pongkhamsing, Chan <[Pongkhamsing.Chan@epa.gov](mailto:Pongkhamsing.Chan@epa.gov)>; Hickey, Patrick J. (He/Him/His) <[hickey.patrick@epa.gov](mailto:hickey.patrick@epa.gov)>  
**Subject:** RE: JBLM - PFAS\_NPDES/CERCLA Integration

Chan, thanks for the introduction. Patrick, I'm getting ready to public notice the NPDES stormwater permit for JBLM (shooting for January). Partly after seeing the [PFAS article](#) in the Seattle Times a few days ago, I got to thinking that I should connect with you to make sure that what we're proposing doesn't create any challenges for potential PFAS mitigation that you're implementing on your end. Let me know if you want to meet and discuss what we're proposing in the stormwater permit and I

can set up a Teams meeting.

Bilin

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**From:** Pongkhamsing, Chan <[Pongkhamsing.Chan@epa.gov](mailto:Pongkhamsing.Chan@epa.gov)>  
**Sent:** Wednesday, December 14, 2022 12:06 PM  
**To:** Basu, Bilin <[Basu.Bilin@epa.gov](mailto:Basu.Bilin@epa.gov)>; Hickey, Patrick J. (He/Him/His) <[hickey.patrick@epa.gov](mailto:hickey.patrick@epa.gov)>  
**Subject:** JBLM - PFAS\_NPDES/CERCLA Integration

Hi Bilin and Patrick,

Connecting you to on the PFAS work you both do at JBLM. There were lessons learned and guidances that were developed from our integration between the NPDES/Enforcement/CERCLA programs on Whidbey Island back in 2019. And it sounds like Bilin has all the documents associated with that effort and all those that were involved (Mat Martinson, Misha V, Brian Nichols, Erin Seyfried, Margaret McCauley, Jeff Kenknight, Brian Levo, attorneys from ORC, and Jennifer Malloy from HQ)

Enjoy coordinating and working together!!

Thank You. Be Safe, Be Well!



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